

## **REMARKS**

Claims 1, 6, 11, 14 and 15 have been amended. Claims 3 and 8 have been cancelled. New claims 24-26 have been added. Claims 1, 6, 9-15 and 24-26 are currently pending in the present application. Reconsideration of the present application is respectfully requested in view of the foregoing amendments and the following remarks.

### ***Objections to the Claims***

Claim 1 has been amended to overcome the objection.

### ***Rejections of the Claims under 35 U.S.C. 101***

Claim 15 has been amended to overcome the rejection. More particularly, claim 15 now recites, "Computer program product encoded in one or more tangible computer readable media and when executed operable to..."

### ***Rejections of the Claims under 35 U.S.C. 103***

Claims 1, 4, 8 and 15 were rejected under 35 U.S.C. 103(a) as being unpatentable over US Patent 5,237,648 issued to Mills in view of U.S. Patent 6,882,793 issued to Fu, both of which have been discussed in a previous response. These rejections are respectfully traversed.

It is respectfully submitted that no reasonable combination of the art of record teaches or suggests the combination of limitations recited in amended claim 1.

The Mills reference teaches a method and apparatus for editing a video recording by selecting and displaying video clips. As illustrated in Fig. 2 of Mills, and described in column 4 lines 47-59, a clip list window 22 includes a number of rows of edit windows 38 arranged in three columns: "The first column corresponds to a begin frame 40 of a video clip frame sequence for that row, the second column corresponds to the end frame 42 of the video clip frame sequence, and the last column corresponds to the video clip frame sequence 44 itself." In this manner, a video clip sequence 44 is displayed by first specifying a begin frame from the original video source and subsequently specifying an end frame from the original video source. However, it should be noted that, "the clip frame sequence 44 for that row is comprised of the SDFs [small digitized frames] of the begin and end frames 40 and 42 and **all SDFs in between**

(See column 5 lines 5-7).” In other words, each sequence in the last column of each row includes the specified begin frame, the specified end frame and all of the video frames in between the specified begin and end frames. Furthermore, the process of forming the video sequence is performed automatically. More particularly, “When the begin and end edit windows in the same row are filled with different SDFs, the video frames between those respective points are digitized and automatically inserted into the clip column for that row (See Abstract).” Therefore, each sequence includes the original ordering of the video frames from the video source.

In contrast, claim 1 has been amended to specifically require, “selecting at least two of any of the plurality of video frames in any display order,” and “creating the video montage by ordering the selected at least two of the plurality of video frames into **an order that is different than the original DVD display order.**” As described on page 8 of the present specification, “The viddie clips are then assembled to form the viddie montage or video montage 110. Note in the illustration that viddie clips 101, 102, 103, 104, 105, 106 are taken from video title in a scrambled order. This example illustrates that viddie clips may be pulled from any part of a title, and thereafter **arranged in any order** in the montage. Moreover, viddie clips may be pulled from any title that appears on the DVD.” It is respectfully submitted that Mills does not teach or suggest the arrangement of video frames into an order that is different than the ordering of the video frames in the original video source.

Additionally, it is respectfully submitted that Fu (which was merely relied upon to teach that the video source may be a DVD) fails to cure the deficiencies of Mills.

In view of the foregoing, the Applicants believe that no reasonable combination of Mills and Fu teach or suggest the combination of limitations recited in claim 1 and respectfully request that the Examiner withdraw the rejection thereof and all claims dependent thereon. Independent claim 15 recites similar limitations as those recited in claim 1 and is also believed to be allowable for at least similar reasons as those described above for claim 1.

## **CONCLUSION**

In view of the foregoing, it is respectfully submitted that all pending claims are allowable. Should the Examiner believe that a further telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Respectfully submitted,  
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